

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

x-----x  
RONARD LORA, and HUGO RIVERA, individually  
and on behalf of all others similarly situated,

Plaintiffs,

J.V. CAR WASH, LTD., BROADWAY HAND  
CAR WASH CORP., WEBSTER HAND  
CAR WASH CORP., HARLEM HAND  
CAR WASH INC., BAYWAY HAND  
CAR WASH CORP., JOSE VASQUEZ  
SATURNINO VARGAS, JOSE JIMENEZ,  
RAMON PEREZ, DOMINGO "DOE",  
ADOLFO "DOE" AND JOHN "DOE" 1-10,

Defendants.

x-----x

**NOTICE OF TAKING OF  
DEPOSITION OF PLAINTIFFS  
WITH NOTICE TO PRODUCE  
DOCUMENTS**

Docket No.: 11 CV 9010 (LLS)

To: RONARD LORA, HUGO RIVERA, BRAULIO FLORES MALAMOROS, DENIS RENE  
BARAHUNA, EDUARDO LORA, GIOVANNI PAULINO, JOSE RODRIGUEZ, MARCO  
ANTONIO DIAZ, MARGARITO GALLARDO, MELVIN LORA, RAMON M. ALVAREZ,  
ROBERTICO PEREZ, JOSE ANTOINIO PICHARDO, JOSE RODRIGUEZ-TINEO,  
MICHEL RODRIGUEZ, FRANCISCO L. QUERRERO, ROJAS CORONA VALERIO, and  
RAMIRO RODRIGUEZ

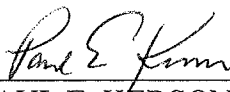
PLEASE TAKE NOTICE that defendants will take testimony, upon oral examination of  
plaintiffs, RONARD LORA, HUGO RIVERA, BRAULIO FLORES MATAMOROS, DENIS RENE  
BARAHUNA, EDUARDO LORA, GIOVANNI PAULINO, JOSE RODRIGUEZ, MARCO  
ANTONIO DIAZ, MARGARITO GALLARDO, MELVIN LORA, RAMON M. ALVAREZ,  
ROBERTICO PEREZ, JOSE ANTOINIO PICHARDO, JOSE RODRIGUEZ-TINEO,  
MICHEL RODRIGUEZ, FRANCISCO L. QUERRERO, ROJAS CORONA VALERIO,  
RAMIRO RODRIGUEZ MICHEL RODRIGUEZ, FRANCISCO L. QUERRERO, ROJAS  
CORONA VALERIO, and RAMIRO RODRIGUEZ whose address is c/o Arenson, Dittmar &  
Karban, 295 Madison Avenue, Suite 700, New York NY 10017, on July 24, 2012 at 10 o'clock in

the forenoon of that day before a Notary Public in and for the State of New York at the Law Offices of Leavitt, Kerson & Duane, at 228 E. 45th Street, 17th floor, New York NY 10017.

Defendants hereby request plaintiffs RONARD LORA, HUGO RIVERA, BRAULIO FLORES MATAMOROS, DENIS RENE BARAHONA, EDUARDO LORA, GIOVANNI PAULINO, JOSE RODRIGUEZ, MARCO ANTONIO DIAZ, MARGARITO GALLARDO, MELVIN LORA, RAMON M. ALVAREZ, ROBERTICO PEREZ, MICHEL RODRIGUEZ, FRANCISCO L. QUERRERO, ROJAS CORONA VALERIO, and RAMIRO RODRIGUEZ to appear for this oral examination at the above time and place and requests plaintiffs RONARD LORA, HUGO RIVERA, BRAULIO FLORES MATAMOROS, DENIS RENE BARAHONA, EDUARDO LORA, GIOVANNI PAULINO, JOSE RODRIGUEZ, MARCO ANTONIO DIAZ, MARGARITO GALLARDO, MELVIN LORA, RAMON M. ALVAREZ, ROBERTICO PEREZ, MICHEL RODRIGUEZ, FRANCISCO L. QUERRERO, ROJAS CORONA VALERIO, RAMIRO RODRIGUEZ to produce and to permit defendants to copy and inspect at the oral examination at the above time and place each of the following documents: the drivers' license, Social Security Card from the U.S. Social Security Administration, "Green card" concerning immigration status from the U.S. Department of Homeland Security or successor or predecessor government agency, pay stubs from any or all of the defendants, and U.S. and NY and/or NJ Income Tax Returns for each and every one of the above-named plaintiffs and any and all documents reflecting employment by each and every one of the above-named plaintiffs with any or all of the defendants.

You are invited to attend and cross-examine.

Dated: July 2, 2012  
New York, NY

  
\_\_\_\_\_  
PAUL E. KERSON  
Leavitt, Kerson & Duane  
Attorneys for Defendants  
228 E. 45th Street, 17th floor  
New York, NY 10017  
(212) 973-9339

STATE OF NEW YORK, COUNTY OF

ss.:

I, the undersigned, am an attorney admitted to practice in the courts of New York, and

☐ Certification certify that the annexed  
By Attorney has been compared by me with the original and found to be a true and complete copy thereof.

say that: I am the attorney of record, or of counsel with the attorney(s) of record for,  
, I have read the annexed

☐ Attorney's know the contents thereof and the same are true to my knowledge, except those matters therein which are stated  
Affirmation to be alleged on information and belief, and as to those matters, I believe them to be true. My belief, as to those  
matters therein not stated upon knowledge, is based upon the following:

The reason I make this affirmation instead of

Is

I affirm that the foregoing statements are true under penalty of perjury.

Dated:

(Print signer's name below signature)

STATE OF NEW YORK, COUNTY OF

ss.:

being duly sworn says: I am the

☐ Individual in the action herein: I have read the annexed  
Verification know the contents thereof and the same are true to my knowledge, except those matters therein which are stated  
to be alleged on information and belief, and as to those matters, I believe them to be true.

☐ Corporate a corporation, one of the parties to the action: I have read the annexed  
Verification know the contents thereof and the same are true to my knowledge, except those matters therein which are stated  
to be alleged on information and belief, and as to those matters, I believe them to be true.  
My belief, as to those matters therein not stated upon knowledge, is based upon the following:

Sworn to before me on , 20

(Print signer's name below signature)

STATE OF NEW YORK, COUNTY OF NEW YORK

ss.:

MAZEL YAKUBOV, being duly sworn says: I am not a party to the action, am over 18 years of age and reside at Queens County.

On July 2, 2012, I served a true copy of the annexed NOTICE OF TAKING OF DEPOSITION OF PLAINTIFFS WITH NOTICE TO PRODUCE DOCUMENTS

in the following manner:

☒ Service by Mail by mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

☐ Personal Service on Individual by delivering the same personally to the persons and at the addresses indicated below:

☒ Service by Electronic Means by transmitting the same to the attorney by electronic means to the telephone number or other station or other limitation designated by the attorney for that purpose. In doing so I received a signal from the equipment of the attorney indicating that the transmission was received, and mailed a copy of same to that attorney, in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

☐ Overnight Delivery Service by depositing the same with an overnight delivery service in a wrapper properly addressed. Said delivery was made prior to the latest time designated by the overnight delivery service for overnight delivery. The address and delivery service are indicated below:

Steven Arenson, Esq.  
Laura E. Longobardi, Esq.  
Arenson, Dittmar & Karban  
Attorney For Plaintiffs  
295 Madison Avenue, Suite 700  
New York, NY 10017

VIA ECF, FAX (212) 490-7102 &amp; U.S. MAIL

Sworn to before me on July 2, 2012

*Paul E. Kerson*  
PAUL E. KERSON  
Notary Public, State of New York  
No. 4643475  
Qualified in Westchester County  
Commission Expires 11-30-13

*Mazel Yakubov*  
MAZEL YAKUBOV

Docket No.: 11 Civ. 9010 (LLS)  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
RONARD LORA and HUGO RIVERA, Individually  
and on behalf of all others similarly situated,

Plaintiffs,

-against-

J.V. CAR WASH, LTD., BROADWAY HAND CARWASH,  
CORP. WEBSTER HAND CARWASH CORP., HARLEM  
HAND CAR WASH INC., BAYWAY HAND CAR WASH  
CORP., JOSE VASQUEZ, SATURNINO VARGAS, JOSE  
JIMENEZ, RAMON PEREZ, DOMINGO "DOE", ADOLFO  
"DOE" AND JOHN DOES 1-10,

Defendants

NOTICE OF TAKING OF DEPOSITION OF PLAINTIFFS  
WITH NOTICE TO PRODUCE DOCUMENTS

**LEAVITT, KERSON & DUANE**

Attorneys for Defendants  
228 E. 45th St., 17th Floor  
New York, NY 10017  
(212) 973-9339  
Fax (212) 973-9494

*Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certified that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.*

Dated: \_\_\_\_\_ Signature: \_\_\_\_\_

Print Signer's Name \_\_\_\_\_

Service of a copy of the within \_\_\_\_\_ is hereby admitted.

Dated: \_\_\_\_\_  
Attorney(s) for \_\_\_\_\_

PLEASE TAKE NOTICE

- ☐ Notice of Entry that the within is a (certified) true copy of a entered in the office of the clerk of the within Court on
- ☐ Notice of Settlement that an of which the within is a true copy will be presented for settlement to the Hon. one of the Judges of the within named Court, at on , 20 at 9:30 a.m.

LEAVITT, KERSON & DUANE  
Attorneys for Defendants  
228 E. 45th St., 17th Floor  
New York, NY 10017  
(212) 973-9339

To: